



**Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety**

Substance Abuse Program:

Comprehensive Audit and Inspection Protocol Form

Alcohol Testing Sites

Form No.: 3.1.8

January 29, 2010

Protocol Area P: Alcohol Testing Sites

Service Provider Profile and General Site Information

Official Company Name of Service Provider:		Clinical Collection Management, Inc.	
Official Address		8730 Big Bend, Suite A, St. Louis, MO 63119	
Business Tax ID Number	Ameren Services BTIN N0.43-1799279		
Operator/Contractor Name and Op ID or Business Tax ID number utilizing the above Service Provider:	Ameren Op ID No.-32513		
Operator's/Contractor's Substance Abuse Program Mgr / DER:	Karan Henderson and Linda Gudorp	Phone No.: 314-554-4047 and 314-554-3307	
Service Provider Company Contact Information		Service Provider's Official Representative Contact	
Other Company Name or ID:	Clinical Collection Management, Inc.	Name:	Thomas (Tom) Fettig
Ph. No.:	314-963-9404	Ph. No.:	314-963-3404 ext.100
Fax No.:	314-963-3406	Fax No.:	314-963-3406
Email/Web Address	http://www.ccm-drugtest.com/	Email	thomas@ccm-drugtest.com
Mailing Address: (If different from official address)	Same as above	PHMSA (Lead) Representative:	Valerie Schwing
		Date of Audit/ Inspection:	July 24, 2015
Technician Interviewed		Telephone Number	Comment
Jason Hamilton		March 4, 2019	

Key Persons	Name/Title	Phone/Email Address
Primary Service Provider Representative Interviewed or Providing Information	Karan Henderson and Linda Gudorp	314-554-4047 khenderson@ameren.com 314-554-3307
Others Interviewed, Providing Information or Present at Audit:		

PHMSA and State Representatives Participating:

Name/Title	Office/Organization	Email Address
Valerie Schwing/Pipeline Safety Analyst	Illinois Commerce Commission	

Contact Information:

Any questions or requests for guidance related to this audit protocol document should contact:

Stanley T. Kastanas, Director

Office of Substance Abuse Policy, Investigations and Compliance

Pipeline and Hazardous Materials Safety Administration (PHMSA)-Pipeline Safety (OPS)

Washington, DC 20590

Contact Number: 202-550-0629

E-mail Address: Stanley.Kastanas@DOT.GOV

Auditor Notes and Additional Information:

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Protocol Area P. Alcohol Testing Sites – Audit Information

- [P.01](#) Alcohol Testing Personnel
- [P.02](#) Alcohol Testing Sites, Forms and Supplies
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- [P.04](#) Alcohol Confirmation Tests
- [P.05](#) Problems in Alcohol Testing

P.01 Alcohol Testing Personnel

Verify that training and usage of personnel is in compliance with the applicable requirements of Part 40.

P.01.a. Does the operator's plan specify training for BATs and STTs that is in compliance with §40.213 and does the documentation certify that all requirements are met [§40.213(g)]?

P.01.a. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The operator's plan specifies training for BATs that is in compliance with §40.213 in Section VI. Alcohol Misuse Prevention Program Page 28. Personnel and Testing. Staff verified documentation and certified that all requirements are met [§40.213(g)]. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.01.b. Does the plan specify that a supervisor shall not serve as the BAT or STT if that supervisor makes the reasonable cause determination [§40.211(c) and §199.225(b)(2)].

P.01.b. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan specifies that a supervisor shall not serve as the BAT if that supervisor makes the reasonable cause determination [§40.211(c) and §199.225(b)(2)]. Staff also verified with this process with the collector
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.02 Alcohol Testing Sites, Forms and Supplies

Verify that alcohol testing sites, forms and supplies are in compliance with the applicable physical and security requirements of Part 40.

P.02.a. Does the alcohol testing site comply with the applicable physical and security requirements of §40.221 and §40.223?

P.02.a. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Staff verified that alcohol testing sites, forms and supplies are in compliance with the applicable physical and security requirements of Part 40. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.02.b. Does the plan specify that only EBTs and ASDs listed on the NHTSA CPL will be used for DOT alcohol testing [§40.229]? Also, does the plan specify that an EBT must be used for conducting the confirmation tests [§40.231(a)]?

P.02.b. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan specifies that only EBTs and ASDs listed on the NHTSA CPL will be used for DOT alcohol testing in Section VI. Alcohol Misuse Prevention Program Page 28. Also, the plan does specify that an EBT must be used for conducting the confirmation tests. Staff also verified with this process with the collector
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.02.c. Does the operator follow the Quality Assurance Plan (QAP) for the EBT that is used [§40.233(c)(1)]? If this service is contracted out does the operator ensure that the QAP is being followed [§40.233(c)]?

P.02.c. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Staff verified that the operator follows the Quality Assurance Plan “(QAP)” for the EBT as described in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Testing Sites, Forms, and Supplies. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.02.d. Does the plan specify that the operator or its agents shall comply with the QAP and manufacturer’s instructions and does the operator follow the QAP for the ASD that is used [§40.235 and §40.235(c)]?

P.02.d. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Staff verified the RVT4 calibration is done once a month and sent in to the manufacture every two years as described in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Testing Sites, Forms, and Supplies. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.03 Alcohol Screening Tests

Verify that alcohol screening tests are performed in compliance with the applicable requirements of Part 40.

P.03.a. Does the plan prescribe that only the DOT-approved Alcohol Testing Form (ATF) shall be utilized [§40.225(a)]?

P.03.a. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Staff reviewed the DOT-approved Alcohol Testing Form “(ATF)” shall be utilized. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.03.b. Does the plan specify that the employee shall provide a positive identification through use of photo ID or by employer representative [§40.241(c)]?

P.03.b. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	Staff verified with the collector the employee shall provide a positive identification through use of photo ID or by employer representative. The plan specifies that the employee shall provide a positive identification through use of photo ID or by employer representative in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Testing Test. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.03.c. Does the plan indicate that the BAT or STT shall explain the testing process to the employee [§40.241(e)]?

P.03.c. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan indicates that the BAT or STT shall explain the testing process to the employee in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Testing Test. Staff verified the collector does explain the testing process to the employee. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.03.d. Does the plan contain specific instructions for conducting alcohol screening tests in compliance with §40.241 and §40.243 requirements?

P.03.d. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan contains specific instructions for conducting alcohol screening tests in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Testing Test. Staff also verified the collector had specific
	Potential Issue Identified (explain)	
	N/A (explain)	

	Not Inspected	instructions for conducting alcohol screening tests. Staff also verified with this process with the collector
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P.03.e. Does the plan contain specific instructions for conducting alcohol screening tests using a saliva ASD in compliance with §40.245 requirements?

P.03.e. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan contain specific instructions for conducting alcohol screening tests using a saliva ASD in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Screening with ASD. This however, is not the operator's preferred method. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.03.f. Does the plan specify actions that are taken after receipt of alcohol screening test results that are in compliance with §40.247?

P.03.f. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does specify actions that are taken after receipt of alcohol screening test results that are in Section VI. Alcohol Misuse Prevention Program Page 29 Alcohol Screening Results. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.04 Alcohol Confirmation Tests

Verify that alcohol confirmation tests are performed in compliance with the applicable requirements of Part 40.

P.04.a. Does the plan provide guidance for the actions a new BAT must complete to conduct a confirmation test in compliance with §40.251(b)?

P.04.a. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does provide guidance for the actions a new BAT must complete to conduct a confirmation test in Section VI. Alcohol Misuse Prevention Program Page 30 Alcohol Confirmation Test. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.04.b. Does the plan specify procedures to be followed in conducting a confirmation test that are in compliance with §40.253 and §40.255?

P.04.b. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The does plan specify procedures to be followed in conducting a confirmation test Section VI. Alcohol Misuse Prevention Program Page 30 Alcohol Confirmation Test. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.05 Problems in Alcohol Testing

Verify that procedures for addressing problems in alcohol testing are in compliance with the applicable requirements of Part 40.

P.05.a. Does the plan address the situations for which the employee is considered to have refused to take an alcohol test [§40.261(a)(1) to (7)]?

P.05.a. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does address the situations for which the employee is considered to have refused to take an alcohol test in Section VI. Alcohol Misuse Prevention Program Page 30 Problems in Alcohol Testing. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.05.b. Does the plan specify procedures concerning an employee's inability to provide an adequate amount of saliva for testing and instructions for requiring the employee to attempt again to provide adequate amount of saliva for testing [§40.263]?

P.05.b. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does specify procedures concerning an employee's inability to provide an adequate amount of saliva for testing and instructions for requiring the employee to attempt again to provide adequate amount of saliva for testing in Section VI. Alcohol Misuse Prevention Program Page 30 Canceling Alcohol Testing. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.05.c. Does the plan specify procedures concerning an employee's inability to provide an adequate amount of breath for testing in compliance with §40.265?

P.05.c. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does specify procedures concerning an employee's inability to provide an adequate amount of breath for testing in Section VI. Alcohol Misuse Prevention Program Page 30 Problems in Alcohol Testing. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.05.d. Does the plan specify under what conditions that an alcohol test shall be cancelled [§40.267 and §40.269]?

P.05.d. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does specify under what conditions that an alcohol test shall be cancelled in Section VI. Alcohol Misuse Prevention Program Page 30 Canceling Alcohol Testing. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

P.05.e. Does the plan specify procedures concerning the potential inability to complete an alcohol test and trying to successfully complete the test [§40.271]?

P.05.e. Inspection Results (type an X in exactly one cell below)		Inspection Notes
X	No Issue Identified	The plan does specify procedures concerning the potential inability to complete an alcohol test and trying to successfully complete the test Section VI. Alcohol Misuse Prevention Program Page 30 Canceling Alcohol Testing. Staff also verified with this process with the collector.
	Potential Issue Identified (explain)	
	N/A (explain)	
	Not Inspected	

Protocol Area P - Documents Reviewed			
Document Number	Rev	Date	Document Title